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December 9, 2011

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

June Adams, Esq. City of Detroit Law Department 660 Woodward Ave Ste 1650 Detroit, MI 48226

Re:

Pamela Willis Turner v City of Detroit

Case No.: 11-cv-12961-JAC-MAR

Dear Ms. Adams:

Per our recent conversation, please be advised that I spoke to Ms. Turner, and she has agreed to early facilitation in this matter. Considering the discovery date of February 28, 2012, I recommend we facilitate in mid January to late January, 2012.

I recommend the following four facilitators: Carole Chiamp, Judge James Rashid; Judge Isidore Torres; and/or Judge Barry Howard. Please advise at your earliest convenience if any of the above facilitators are acceptable. My office will attempt to schedule the facilitation promptly.

Also, Defendant, City of Detroit is now late in its response to Plaintiff's Interrogatories and Request for Production of Documents in this matter, which was due on November 21, 2011. Please advise at your earliest when we can expect the discovery.

If we are not successful in facilitation, I will require the Duces Tecum depositions of several of Defendant's employees including: Director of the Detroit Water Department, Sue McCormick; former chair Detroit Water Commission Mary Blackman, former member Water Commission Carla Walker Miller, Shannon Holmes, City of Detroit Human Resources, City Council member, Joann Watson, former Mayor Kenneth Cockerel, Jr., and Mayor Dave Bing.

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Thank you for your prompt consideration of this matter.

Alice B. Jennings

ABJ/cdc

cc: Felicia Duncan Brock, Esq.

Valerie A. Colbert-Osamuede, Esq.